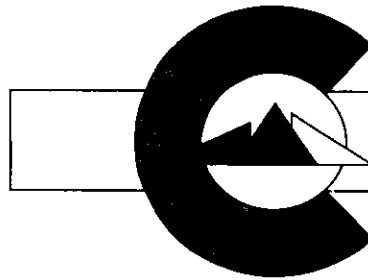


**John Martin**  
Glenwood Springs, CO

**Larry McCown**  
Rifle, CO

**Walt Stowe**  
Glenwood Springs, CO



EIS000809

**Garfield County**  
**Board of County Commissioners**

January 10, 2000

RECEIVED

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Wendy R. Dixon  
EIS Project Manager  
M/S 010  
U.S. Department of Energy  
Office of Civilian Radioactive Waste Management  
Yucca Mountain Site Characterization Office  
P.O. Box 30307  
North Las Vegas, NV 89036-0307

Dear Ms. Dixon,

Thank you for the opportunity to provide comments regarding the Yucca Mountain EIS. Our concerns and observations are in five specific areas that are addressed separately in the following paragraphs.

- 1...
1. Extent of DOE Assistance to Local Entities—We noted that the DOE has stated in the EIS that they will provide local entities with technical and financial assistance for training of local public safety officials. While we applaud this action, we would like to have more details regarding the extent of the training to be provided and the prospect for follow-up training. Further, as you know Garfield County and other counties along the I-70 corridor have limited staffs and budgets. We have a host of federal and state organizations as well as a number of local volunteer response organizations that rely on the ½ FTE which we have available for emergency management coordination. We are doubtful that our limited resources will be able to orchestrate the appropriate response to an emergency such as a hazardous waste or nuclear spill. The County and its associated volunteer response organizations could probably identify the product and emergency, and could secure the area until more qualified personnel could arrive at the scene and stabilize the situation. But beyond that, we don't have the knowledge or the capability to deal with such an event and the thousands of additional nuclear shipments just add to the total risk along the corridor.

As you may know, Garfield County has some "Pinch Points" along the corridor in which there is a convergence of road, rail, and water. If an event happens in one of these areas, it will affect all three. The railroads have never involved

1 cont. us or shared in their plans for responding to an incident. The Colorado Department of Transportation is just now activating a corridor response group, and the Environmental Protection Agency has abdicated its responsibility to local entities. What we need from all, including the Department of Energy, is a coordinated response that is adequately funded. Expecting local entities to “carry the day” for such an event is unrealistic and assures disaster.

2. 2. **DOE Response Time in the Event of an Accident**—As is indicated in the EIS, it is our understanding the DOE will have both DOE and Contractor support responding to an event. We know that such agreements are in place now for shipments throughout the country. However, the EIS does not make clear the extent of the support or the capabilities of the responders, nor does it indicate how rapid the response will be. Our concern emanates from the historical emphasis that the DOE has placed on waste characterization, stabilization, and preparation for shipment and the impetus to move these packaged materials rapidly to burial. DOE resources have been traditionally focused on the front-end work and burial, but fewer quality resources have been focused on transport. This segmented focus has led to incidents in which shipments have leaked (reference the incident at Kingman, Arizona). As Dixie Lee Ray, former head of the Atomic Energy Commission often stated, the real danger with nuclear materials is in moving them from one point to another.

Our request is for assurance that the DOE will apply an appropriate level of resources to improve the prospect for incident free shipments over the life of the project.

3. 3. **DOE Technical Response Capabilities**—The EIS does not make clear the technical capabilities that its response teams will have at their disposal. What are the team’s surface containment capabilities, surface cleanup capabilities, ability to mitigate the impacts to air and water and curtail migration, and its ability to eliminate or reduce risk due to criticality events? What input would local entities have in assuring that such response meets the needs of the local environment, particularly in areas where road, rail, and water converge? We believe it is essential that we understand the resources that will be available to us in meeting the challenges of an incident. Because of this, we feel it is imperative that the dialogue between your response teams and local entities in the corridor begin as soon as possible. In addition, if it were your decision to use rail shipments in the corridor, it would be helpful if the DOE took the initiative to bring the rail owners/shippers to the table to assure a fully integrated response.
- 3... 4. **Liquid Waste Packaging**—We perceive that one of the more difficult challenges for the DOE will be in the area of proper characterization, preparation, and packaging of liquid waste for shipment. These waste constituents are of most concern to us along the I-70 corridor. We know that the DOE is experimenting with a number of vitrification processes, but that the success of these processes has in the past been dependent, in large measure, by the characteristics of the waste streams entering the vitrification process. Further, it is clear that vitrification is still, in many respects, an art form, not a science. Given this and the fact that there are few credible alternatives at this time, we are concerned that the DOE might opt to ship waste in liquid form. We believe that such a

3 cont. decision would dramatically increase the danger to people and the environment. Accordingly, we would strenuously object to the transport of free liquids through our portion of the I-70 corridor and would recommend that the DOE simply hold such shipment of liquids in abeyance until vitrification or some other technology is proven as a viable mechanism for immobilization.

4 5. Transportation Security—From the data presented in the EIS, it appears that acts of sabotage greatly increase the risk of concentrated releases of nuclear material. Our concern in this area emanates from the number of stated shipping points. All told, there are a total of 77 separate shipping points. We know that transportation security is fairly consistent within the DOE. However, we would like to have the assurance that transportation security will be treated uniformly from all 77 shipping points and that the DOE will have ultimate responsibility for the security of all such shipments.

5 In conclusion, we were disappointed to hear that the public hearing in Denver occurred a couple weeks before we received our copy of the EIS. The timing of the hearing in relationship to our receipt of the EIS suggests that the DOE has limited interest in working with local entities to make this project a success. We would appreciate being notified of any future meetings well in advance and to have all appropriate materials or documentation in hand prior to the meeting. 1 cont. Considering the potential for disaster in the constricted area of Glenwood Canyon, it would seem prudent to consider alternative routes for the passage of these materials. We are willing to be an integral part of this emergency preparedness scenario, but would prefer to address the problem and solutions now rather than after a disaster has occurred. Your immediate attention to this matter is appreciated.

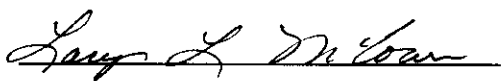
Sincerely,



John Martin  
Chairman, Board of County Commissioners



Walt Stowe  
Member, Board of County Commissioners



Larry McCown  
Member, Board of County Commissioners